

**DECLARATION OF ERIK STRINDBERG**

I, Erik Strindberg, declare as follows:

1. I was appointed by the Court as a Special Master on April 12, 2017 in a case involving the Secretary of Labor v. Paragon Contractors Corp. and Brian Jessop.

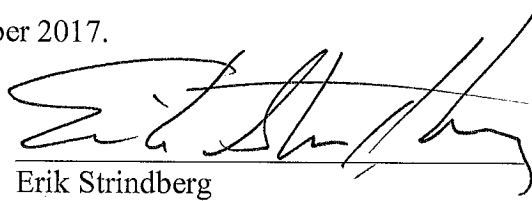
2. Pursuant to the Order Appointing Special Master (Doc. 137), Defendants were ordered to comply with specific reporting requirements to me regarding the location of every work site where they perform work in any capacity. Specifically, Defendants, including any successors in interest of Paragon, "at least three days before beginning work on any project, and immediately for projects on which they already are working," are required to provide notification to me regarding the location of the work sites and the identity and dates of birth of all of the workers on the job sites. Mr. Jessop is required to disclose through email to me, at least five days before commencing work, the location of every job site where he is working in any capacity. Further, Mr. Jessop is required to provide to me within 10 days of changing employment, an affidavit stating the name of his employer, a description of his job duties and the name of his supervisor, as well as provide additional information from a principal of his employer. *See* Doc. 137.

3. Since the entry of the Court's Order on April 12, 2017, I have received two emails from Mr. Jessop. The first is dated May 2, 2017, and is attached hereto as Exhibit A. The second is dated June 29, 2017, and is attached hereto as Exhibit B. These emails encompass the extent of any communication I have had with Defendants.

4. To date I have not conducted any unannounced inspections of the Defendants given Mr. Jessop's representation in his May 2 email that he is not working on any jobsites and does not have any workers or employees.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 13<sup>th</sup> day of September 2017.



Erik Strindberg

**From:** [Erik Strindberg](#)  
**To:** [Bobela, Karen E - SOL](#)  
**Subject:** Fwd: Report  
**Date:** Friday, August 25, 2017 1:21:45 PM

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----- Forwarded message -----

**From:** **Brian Jessop** <[brian@mailcenter.us](mailto:brian@mailcenter.us)>  
**Date:** Tue, May 2, 2017 at 4:58 PM  
**Subject:** Report  
**To:** [specialmaster@utahjobjustice.com](mailto:specialmaster@utahjobjustice.com), [doolin.joseph@dol.gov](mailto:doolin.joseph@dol.gov), [hunt.kevin@dol.gov](mailto:hunt.kevin@dol.gov)  
**Cc:** [rick.sutherland@jacksonlewis.com](mailto:rick.sutherland@jacksonlewis.com), Ken Okazaki <[KOkazaki@joneswaldo.com](mailto:KOkazaki@joneswaldo.com)>

Eric,

At this time Paragon/Brian Jessop have no jobsites in which we are performing any work or have any workers or employees. We have no upcoming contracts or jobsites that we will be working on.

I do not have ownership in any other business

Also at this time I am pursuing another job which looks like it will open up. In accordance with the order I will let you know when I take on that job.

Thank you,  
Brian Jessop

**Exhibit A**

**From:** [Erik Strindberg](#)  
**To:** [Bobela, Karen E - SOL](#)  
**Subject:** Fwd: Need for information  
**Date:** Friday, August 25, 2017 1:21:58 PM

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----- Forwarded message -----

**From:** **Brian Jessop** <[brian@mailcenter.us](mailto:brian@mailcenter.us)>  
**Date:** Thu, Jun 29, 2017 at 3:04 PM  
**Subject:** Re: Need for information  
**To:** Erik Strindberg <[specialmaster@utahjobjustice.com](mailto:specialmaster@utahjobjustice.com)>  
**Cc:** [rick.sutherland@jacksonlewis.com](mailto:rick.sutherland@jacksonlewis.com), Ken Okazaki <[KOkazaki@joneswaldo.com](mailto:KOkazaki@joneswaldo.com)>

Erik,

Please send the statement to PO Box 841665 Hildale, UT 84784.

Beginning July 1st I have taken a job working for Desert Storm Transporation 1280 W Utah Ave. Hildale, Utah. [435-656-9583](tel:435-656-9583). Duties will be to deliver and pickup loads and will not be related to construction work therefore I will not be working on a construction site. Neither I nor Paragon has any ownership in Desert Storm Transportation and I am not in a supervisory role with them. They are working on the affidavit and I will get that to you as soon as it is finished.

Thank you

On Jun 22, 2017, at 4:27 PM, Erik Strindberg <[specialmaster@utahjobjustice.com](mailto:specialmaster@utahjobjustice.com)> wrote:

Mr. Jessop - because I have not heard from you, I need to have you provide me with the following information: 1) your address so I can send you a statement; 2) the name and address of the company where you are working, your position, the type of work you are performing, and the location of the job or job sites where you are working; 3) if you are working, an affidavit containing the information required in the Order appointing a Special Master and an affidavit from a principal of the employer; and 4) the job site or sites of any work that Paragon Contractors Corp is performing work. If Paragon is not performing any work the physical location of all equipment it owns. I have attached a copy of the Order appointing me so that you know what needs to be in each affidavit. Your prompt response to this email is essential.

<# 137\_Order Appointing Special Master 4\_12\_17.pdf>

**Exhibit B**